

United States District Court
For the Eastern District of Wisconsin
Milwaukee Division

U.S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

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CLERK OF COURT

SARAH BOARDMAN
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Milwaukee, WI 53207
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Plaintiff

Vs.

DONALD J. TRUMP, President
United States of America
1600 Pennsylvania Avenue NW,
Washington, DC
20500

Defendants

25-C-0513

COMPLAINT AND REQUEST FOR APPOINTMENT OF RECEIVER

COMES NOW, Sarah Boardman, the Plaintiff, pro se, pursuant to my First Amendment right to petition the government for a redress of grievances, states as follows:

JURISDICTION

1. On January 6, 2021, Defendant Trump, after having previously taken an oath to support the Constitution of the United States, did engage in insurrection or rebellion against the same.
2. Since January 6, 2021, Defendant Trump has given aid or comfort to the Insurrectionists.

3. Most recently, Defendant Trump continued to provide aid or comfort to insurrectionists when he pardoned those who plead guilty or were found guilty of crimes related to the insurrection.
4. Section 3 of the 14th Amendment provides that no person shall hold office under the United States, who shall have engaged in insurrection or rebellion against the United States or given aid or comfort to the enemies thereof.
5. Section 3 of the 14th Amendment establishes a disqualification from holding federal office but does not criminalize holding such an office by a disqualified individual. Actions to remove such individuals do not constitute suits at common law and, therefore, do not warrant a jury trial.
6. Under Article III, Section 2 of the Constitution, the judicial power extends to all cases arising under the Constitution, including the authority to enforce the provisions of Section 3 of the 14th Amendment.
7. In this framework, every branch of government and every law-abiding citizen bears the responsibility to identify prohibited government infiltrators and advocate for their removal.
8. The 14th Amendment aims to purge the government of insurrectionists and their allies—those who advocate for the violent overthrow of a democratically elected government—due to the clear and present danger they pose to the survival of democracy.

9. The 14th Amendment acknowledges the possibility that Senators, Congressmen, and Executive or Judicial officers might engage in insurrection or provide aid and comfort to insurrectionists. Given that high-ranking officials in these branches of government could potentially hinder the enforcement of the Section 3 ban under the 14th Amendment, it becomes the responsibility of citizens possessing evidence of such actions to present it before the judicial branch.
10. Permitting a group of insurrectionists and their supporters to retain positions in the Supreme Court , the Presidency, or the Legislature would contradict the fundamental purpose of the 14th Amendment: to exclude insurrectionists and their supporters from government.
11. The interpretation of the 14th Amendment must be grounded in its historical context.
12. Defendant Trump is an officer of the United States, See *National Treasury Employees Union v. Nixon*, 492 F.2d 587 (D.C. Cir. 1974)

STANDING

13. Defendant Trump has made more than one hundred threats to investigate, prosecute, imprison, or otherwise punish his perceived enemies, including political opponents and private citizens
14. Mike Davis, attorney spokesperson for Defendant Trump, in threatening New York Attorney General, Letitia James, stated "I dare you to try to continue your lawfare

against President Trump and his second term. Because listen here, sweetheart, we're not messing around this time, and we will put your fat ass in prison for conspiracy against rights".

15. Defendant Trump, on Truth Social, stated 'I hereby request that the people who have set off these fake rumors or statements, and who have done so in the past, be immediately investigated by the appropriate authorities".
16. Defendant Trump has repeatedly taken quick and illegal action against his perceived enemies. Within weeks of his taking office, he has removed Secret Service protection for several private citizens, thereby subjecting them to grave danger. More recently, because he felt slighted, Defendant Trump has removed protections for the people of Ukraine, inflicting numerous deaths and injuries. Defendant Trump imposed crippling global tariffs that resulted in a freefall in the stock market rendering retirement accounts untenable.
17. The insurrection that Defendant Trump instigated resulted in the death of Ashli Babbitt, which would fit the legal description of murder.
18. The insurrection that Defendant Trump instigated resulted in the attempted murder of Vice President Pence and Speaker of the House Pelosi.
19. The defendant's acts of vengeance are a matter of public record, carried out with the intent to intimidate the people of the United States. These actions are subject to judicial notice.

20. The plaintiff therefore has standing to sue because Defendant Trump's threats and speedy implementation thereof are individualized and certainly impending against the plaintiff.
21. Numerous Senators and Representatives in Congress, along with certain members of the Supreme Court, have provided aid or comfort to insurrectionists, thereby obstructing the proper judicial review of Defendant Trump's actions.
22. Nevertheless, judicial review of Defendant Trump's conduct is mandated. The plaintiff initiation of this suit is therefore mandated, and the court's insistence for any other procedure would be placing form over substance, which is anathema to the law.
23. The evidence overwhelmingly demonstrates that Defendant Trump instigated an Insurrection, resulting in significant death and destruction. Under the 14th Amendment, his removal from public office is both warranted and necessary.
24. In the November 2024 Presidential election, Defendant Trump and Vance were ineligible to run for their respective offices. Under the legal presumption that individuals are expected to know the law, those that cast their votes for Defendant Trump and Vance either knowingly or negligently supported a symbolic protest, fully aware that their votes held no legal efficacy.
25. Kamala Harris and Tim Walz received the majority of valid votes, making them the duly elected President and Vice President. Consequently, Defendant Trump and

Vance hold their offices illegitimately.

26. Defendant Trump continued tenure in the Presidency presents a significant risk of irreparable harm here at home in the United States and globally, including the erosion of the armed forces, the Department of Justice, the Department of Education, the Department of Health and Human Services, USAID, the Department of Defense and other federal agencies. This contributes to potential public health, security and financial crises, undermines the judiciary's integrity, and leads to the unwarranted loss of skilled federal employees.

WHEREFORE, the plaintiff prays that this court enter and order declaring Defendant Trump and Vance to be illegitimate holders of their respective office and be removed immediately therefrom, and that Kamala Harris and Tim Walz be declared the legitimately elected President and Vice President of the United States.

REQUEST FOR INJUNCTION AND FORMATION OF A THREE JUDGE COURT

1. Under 28 U.S.C 2284, a three-judge court can be established, comprising one U.S. Circuit Court of Appeals Judge and two U.S. District Court Judges.
2. In cases of great public moment, a three-judge court can be supportable since the moral authority of a Federal Court is likely to be maximized if the result cannot be laid to the prejudices or political ambitions of a single District Court Judge.
3. Defendant Trump has incited an insurrection, unleashed his army insurrectionists, exhibited a clear intent to defy court orders, and disregarded multiple laws.
4. The removal of an illegitimate President and Vice President is a case of great public

moment.

WHEREFORE, the plaintiff respectfully requests the formation of a three judge court and a preliminary injunction to appoint Kamala Harris and Tim Walz to their respective offices, or alternatively, to designate a qualified receiver during these court proceedings, thereby preventing Defendant Trump from exercising Presidential powers and causing irreparable harm.

MOTION FOR REQUEST FOR RECUSAL

1. Chief Justice Roberts chose to set aside the principle that no one is above the law hearing oral arguments in *Trump v United States*, 603 U.S. 593 (2024), and conveyed this decision in writing to Justices Gorsuch and Kavanaugh.
2. Supreme Court Justices Gorsuch and Kavanaugh responded in writing to Chief Justice Roberts with a single word, 'brilliant' prior to the oral arguments in *Trump v United States*, 603 U.S. 593 (2024)
3. With full awareness that Defendant Trump advocates the use of violence to unlawfully retain power, as evidenced by his role in the January 6, 2021 insurrection. Justices Roberts, Gorsuch, Kavanaugh, Alito and Thomas chose to disregard the principle that no one is above the law and granted Defendant Trump immunity.
4. In the *Trump v. United States*, 603 U.S. 593 (2024) decision, the Justices acknowledged the President's constitutionally mandated duty to ensure the faithful

execution of laws, yet ruled that Defendant Trump is free to disregard those very laws without government oversight.

5. This decision was made despite the president's fundamental mandate to address the nation's challenges with honesty and integrity.
6. The actions of the Supreme Court Justices appear to provide aid and comfort to Defendant Trump, who is labeled as an insurrectionist.
7. No court, including the Supreme Court of the United States, could interpret the 14th Amendment in a way that absolves Defendant Trump of accountability for the murder, attempted murder, and insurrection that transpired on January 6, 2021.
8. This court possesses inherent powers, encompassing all authority reasonably necessary to safeguard its dignity, independence, and integrity.
9. In exercising its inherent powers, this court should request that Supreme Court Justices Roberts, Alito, Thomas, Kavanaugh and Gorsuch should recuse themselves from adjudicating any appeal in this case.

WHEREFORE, upon reaching a decision in this case, the Plaintiff respectfully that the aforementioned Supreme Court Justices be recused from presiding over this appeal.

EX PARTE MOTION

1. Plaintiff re-alleges the allegations in paragraph 1 through 26.
2. Even under a strict scrutiny standard, with judicial notice of *Trump v. Anderson*, 601 U.S (2024), and the final report of the Special Counsel (Jack Smith Report),

it is unequivocally established that Defendant Trump qualifies as an insurrectionist.

3. Defendant Trump seeks to undermine the other branches of our democracy, aiming to consolidate power and establish a dictatorship.
4. Defendant Trump has effectively gained control of the Legislative branch, which comprises Senators and Congressman who, since his failed insurrection attempt have provided him with aid and comfort.
5. To advance his plan to establish a dictatorship, Defendant Trump has removed qualified leaders from the military and Department of Justice—those loyal to the Constitution---and replace them with unqualified individuals who have pledged loyalty to him.
6. To further his plan to establish a dictatorship, defendant Trump has sought to Discredit, defy, and intimidate the judicial branch.
7. Defendant Trump has called for the Impeachment of judges who ruled against him, urging a Congressman to initiate proceedings against a federal court judge to such a ruling.
8. Recently, Defendant Trump wrote on Truth Social, 'This judge, like many of the crooked judges I am forced to appear before, should be IMPEACHED!'
9. Pam Bondi, Defendant Trump's Attorney General , has openly declared her intent to 'absolutely' continue to defy court orders.

10. Tom Homan, Defendant Trump's "Border Czar", declared, "I don't care what the judges think. I don't care what the Left thinks. We're coming".

11. Defendant Trump's Deputy Chief of Staff described a decision by the U.S. District Court Judge James Boasberg as "without doubt, the most unlawful order a judge has issued in our lifetime".

12. After losing the previous election to President Joseph Biden and facing judicial upholding that outcome, Defendant Trump initiated an insurrectionist attempt and is anticipated to do the same if this decision goes against him.

13. A decision to relieve Defendant Trump of his authority in an ex parte hearing would enable prudent preparation for a secure transfer of power.

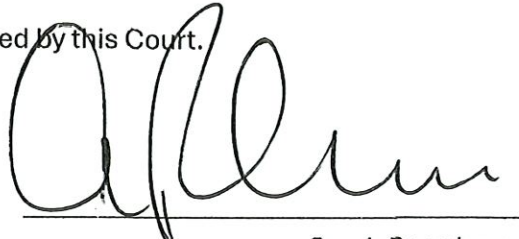
14. Immediate action is essential to halt the ongoing deterioration of our democratic government and its functions.

15. The Plaintiff acknowledges that this ex parte motion can be resolved based solely on the pleadings and does not intend to present oral arguments on this motion.


16. The Plaintiff acknowledges that the decision by a three-judge court can be directly appealed to the U.S. Supreme Court and respectfully recommends that the ruling on this ex parte motion be submitted directly to the Supreme Court.

WHEREFORE, the Plaintiff respectfully requests that an ex parte order be issued, relieving Defendant Trump of his authority and transferring it to a qualified receiver, such as

U.S. Retired Lieutenant General Nadja West, appointed by this Court.


Sarah Boardman

SWORN AND SUBSCRIBED before me this ___ day of April, 2025 by Sarah Boardman.

State Wisconsin
County Milwaukee

EXPIRE 12/26/24 Notary Public

This filing was prepared with the assistance of an attorney



Please refund my filing cost.

Under the Federal Rules of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complainant otherwise complies with the requirements of Rule 11.

Respectfully submitted,


Sarah Boardman